

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ULYSSES RODRIGUEZ CHARLES,
Plaintiff,

v.

CITY OF BOSTON, et al.,

Defendants.

C.A. No. 04-10986-NG

JOINT MOTION FOR ENLARGEMENT OF DISCOVERY PERIOD

Plaintiff Ulysses R. Charles (“Charles”) and the Defendants City of Boston (“City”) and Stanley I. Bogdan respectfully move for an amendment to the current joint scheduling statement endorsed by the Court on December 5, 2005 as follows:

- (a) Fact discovery will be completed by October 30, 2006.
- (b) Plaintiff will disclose his expert(s) and produce the Rule 26(a)(2)(b) report by December 15, 2006.
- (c) Defendants will disclose their expert(s) and produce the Rule 26(a)(2)(b) report by January 15, 2006.
- (d) The parties will serve motions for summary judgment no later than February 15, 2007.

As reasons for the enlargement, the parties states as follows:

1. As the Court is aware, this case concerns events that took place well over two decades ago. It involves many witnesses, a large volume of documents (many old and difficult to locate), and many contentious issues regarding discovery.
2. The parties are engaged in substantial ongoing discovery. They have propounded and answered Interrogatories, and have produced documents, although this discovery is not yet complete.

3. The parties have conferred regarding certain discovery disputes and are attempting to resolve or narrow them. As a result, additional written discovery continues to be exchanged.

4. In addition, the parties are also engaged in taking an extensive series of depositions.

5. Notwithstanding the parties' significant efforts to complete discovery, the parties require additional time in order to, *inter alia*, continue conferring about and attempting to work out discovery disputes, and in order to complete depositions.

6. Because all parties join in this motion, no party will be prejudiced by its allowance. In addition, the allowance of this motion will ensure, through full discovery, that the court has the facts necessary to render a just decision. Accordingly, the interests of justice and judicial economy will be served by the allowance of this motion.

Dated: June 2, 2006
Boston, MA

Respectfully Submitted,

DEFENDANTS, STANLEY BOGDAN
and THE CITY OF BOSTON,
By their attorney:

PLAINTIFF, ULYSSES R. CHARLES
By his attorneys:

/s/ Thomas R. Donohue [by MG]
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